IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RAMIRO FELIX GONZALES,	§	
Plaintiff,	§	
	§	
v.	§	
	§	
BRYAN COLLIER, Executive	§	Civil Case No. 4:21-cv-00828
Director,	§	
Texas Department of Criminal	§	
Justice, Huntsville, Texas;	§	
	§	
BOBBY LUMPKIN, Director,	§	
Texas Department of Criminal	§ §	
Justice, Correctional Institutions		EXECUTION
Division, Huntsville, Texas;	§	SCHEDULED
	§ §	FOR JULY 13, 2022
and		
	§	
DENNIS CROWLEY, Warden,	§	
Texas Department of Criminal	§	
Justice, Huntsville Unit,	§	
Huntsville, Texas,	§	
Defendants.		

PLAINTIFF'S UNOPPOSED MOTION TO SEAL RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND SUPPLEMENTAL EXPERT REPORT

Plaintiff Ramiro Felix Gonzales respectfully requests to file his response to Defendants' Motion for Summary Judgment, Dkt 42, under seal. Discovery in Mr. Gonzales's case is subject to a protective order, Dkt 25, and confidential facts are used and referenced in his response. Mr. Gonzales's response also

heavily cites and references Defendants' Motion, Dkt 42, which is currently

under seal, Dkt 44. Mr. Gonzales seeks to avail himself of those facts while

abiding by the terms of the joint protective order.

Mr. Gonzales also asks to seal the supplemental report of his expert, Dr.

Mark Heath. That short supplement was generated after Dr. Heath became

subject to the protective order in this case and reviewed Director Lumpkin's

confidential deposition and the summary judgment motions. His initial report

is not being filed under seal because it does not rely on confidential

information.

Allowing Mr. Gonzales to file these documents under seal will not

prejudice or hinder Defendants in litigating this case. Mr. Gonzales will

provide Defendants' counsel with copies of these filings.

Dated this 20th day of June, 2022.

Respectfully submitted,

JASON D. HAWKINS

Federal Public Defender

/s/ Jeremy Schepers

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CERTIFICATE OF WORD COUNT

Counsel certifies that the	body of this	Motion	contains	171	words,	according	to
his word-processing progr	am.						

<u>/s/ Jeremy Schepers</u> Jeremy Schepers

CERTIFICATE OF CONFERENCE

Counsel certifies that he conferred with opposing counsel, Leah O'Leary, who informed the undersigned that Defendants are unopposed to the relief requested in this Motion.

<u>/s/ Jeremy Schepers</u> Jeremy Schepers

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2022, I sent a true and correct copy of the foregoing was filed in this Courts CM/ECF system, which will serve Leah O'Leary, counsel for the Defendants, at leah.oleary@oag.texas.gov.

/s/ Jeremy Schepers
Jeremy Schepers